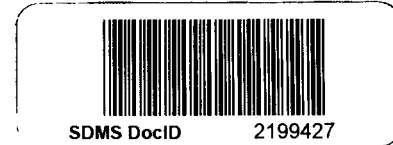


May 15, 2012

Mr. Kenneth Rose  
Financial Analyst (3HS62)  
US Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

ORIGINAL



RE: Metro Container, Trainer PA  
EPA Request for Information

Dear Mr. Rose:

In response to the March 22, 2012 letter from Joanne Marinelli of EPA, enclosed please find the National Railroad Passenger Corporation (Amtrak) response.

Please contact me at 215-349-6968 or [caldwec@amtrak.com](mailto:caldwec@amtrak.com) if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "C. M. Caldwell".

Craig M. Caldwell  
Environmental Superintendent

cc (cover letter and pdf): Michael Stern, Amtrak  
Rich Mohlenhoff, Amtrak  
Roy Deitchman, Amtrak

Amtrak Response to EPA information Request on Metro Container Site

1. Amtrak has found information that 230 empty, drained and crushed drums were shipped from Amtrak's Wilmington Shops in March of 1988. Prior to crushing, these drums were used for storage of waste oils. Original products stored in the drums are unknown; however they likely were used for storage of clean lubricating oils prior to being used for the storage of waste oils.

a) Amtrak's Wilmington Shops are located at 4001 Vanderveer Ave, Wilmington DE, 19802

b) Amtrak's Wilmington shops conduct repair and overhaul of locomotives, passenger coaches and other equipment used for track and catenary work.

No other business records relating Metro Container could be found for any other Amtrak facility.

2. Typically Amtrak receives clean new oil in 55 gallon drums for use as lubricating oils. Once all of the clean oil is removed from the drum, the drum is often used to collect used lubricating oils. After a number of drums are filled, a used oil recycling firm empties the drums using a vacuum truck. The drums were then drained, crushed and shipped to Metro Container.
3. No records could be found regarding the original contents of the drums shipped to Metro container. We suspect that the drums contained petroleum oils and lubricants.
4. Waste products generated by these processes include: used lubricating oils, oily rags and debris as well as empty drums.
5. Original products stored in the drums are unknown, so no information can be provided regarding those materials. Used Oils were shipped to Petrocon for recycling.
6. In addition to the various products described above, Amtrak also likely stored the following products in drums at the site:
  - Cleaning solutions
  - Clean oils such as lubricating, hydraulic, or dielectric
  - Oily debris and sludges
  - Used oils from various processes
  - PCB waste from transformer retro-fills
  - Paint waste
  - Sand blast waste

7. 230 empty, drained and crushed drums were shipped to Metro Container for disposal from Amtrak's Wilmington DE shops in March 1988.
8. A specific process for determining which drums were shipped to Metro Container can not be provided, however it does appear that the drums were inspected by a representative of Metro Container a few days prior to shipment.
9. 230 empty, drained and crushed drums were shipped to Metro Container for disposal in March 1988.
10. The 230 drums shipped to Metro Container were empty, drained and crushed prior to shipment. These drums likely contained clean oil or used oil prior to shipment to Metro Container.
11. No contracts or purchase orders with Metro Container could be found in Amtrak's records review, however a copy of the shipping document for the 230 empty, drained and crushed drums sent to Metro Container in March 1988 is attached. Also attached are copies of the original correspondence between EPA and Amtrak concerning this matter, as well as a contemporaneous chronology of the shipment prepared by an Amtrak employee.
12. This response was prepared by:

Craig Caldwell  
Amtrak  
Environmental Superintendent  
30<sup>th</sup> Street Station  
Box 13  
Philadelphia PA 19104  
(215) 349-6968

Other persons consulted in the development of this response:

Tom Clark  
Amtrak  
Senior Contracting Agent  
30<sup>th</sup> Street Station  
Philadelphia PA 19104  
(215) 349-1062

Gloria Johnson  
Amtrak  
Finance Director  
30<sup>th</sup> Street Station  
Philadelphia PA 19104  
(215) 349-1289

Bernard Reynolds  
Amtrak  
Deputy Logistics Officer, Procurement  
30<sup>th</sup> Street Station  
Philadelphia PA 19104  
(215) 349-3170

Camille Ross  
Amtrak  
Senior EHS Coordinator  
40 Massachusetts Ave  
Washington DC 20002

Andy Enzman  
Amtrak  
Senior Environmental Coordinator  
30<sup>th</sup> Street Station  
Box 13  
Philadelphia PA 19104

Ken Rose  
US Environmental Protection Agency  
1650 Arch Street  
Philadelphia PA 19103  
(215) 814-3147

13. Amtrak is unable to locate any copies of the records previously provided to EPA in 1988. Amtrak is also unable to locate any other records relating to Metro Container. Our supposition at this time is that the original records and any other records have been destroyed. We are research the historic corporate records relating to former Amtrak Records Retention and Document Destruction Policies, as well as searching for documentation relating to the destruction of the original records. Amtrak will provide more information as soon as it becomes available.
14. Amtrak has no additional information to provide in response to this question.

ORIGINAL

National Railroad Passenger Corporation, 400 North Capitol Street, N.W., Washington, D.C. 20001 Telephone (202) 383-3000



ORIGINAL  
(Red)

May 24, 1988

Mr. Lawrence Falkin  
United States Environmental Protection Agency  
CERCLA Removal Enforcement Section (3HW14)  
841 Chestnut Building  
Philadelphia, PA 19107

Dear Mr. Falkin:

Please refer to your recent undated letter concerning the CERCLA action EPA proposes to undertake at the Metro Container Site.

According to our records, Amtrak's only involvement with Metro Container was their removal of 230 completely empty, crushed 55-gallon drums from our Wilmington, DE shops. These drums had formerly held non-hazardous materials, and had been fully drained prior to crushing.

Based on the above, we do not believe that we can properly be considered a PRP at this site. We do not, therefore, plan to accept your offer to participate in the activities outlined in the scope of work enclosed with your letter.

Very truly yours,

A handwritten signature in dark ink, appearing to read "R. T. Noonan", written over a horizontal line.

R. T. Noonan  
Senior Director  
Environmental Control

Amtrak

ORIGINAL  
(Red)

April 27, 1988

United States Environmental  
Protection Agency  
Region III  
84 Chestnut Building  
Philadelphia, Pa. 19107

Attn: Mr Lawrence Falkin

Re: Metro Container Corporation Site

Dear Mr. Lawrence:

This is in response to Mr. Bruce P. Smith's letter of April 12, 1988 to our Mr. Denney. As we discussed by telephone on April 20, 1988, that letter was forwarded to me for response. Thank you for extending the due date to May 2, 1988.

The following information is submitted in the format of Mr. Smith's request:

1. To the best of our knowledge Amtrak did not generate or transport or have transported any hazardous substances to this site.
2. Amtrak disposed of 230 empty, crushed drums at this site. The drums were transported to the site by Metro Container Enterprises.
3. The shipping documents in our possession do not indicate a shipping date. However, a purchase order was confirmed in a telephone award to Metro Enterprises on March 22, 1988. According to our on-site personnel, the crushed drums were loaded on a Metro Container truck and shipped on March 24, 1988.
4. We are not aware of any correspondence between Amtrak and any regulatory agency regarding these containers.
5. The only known correspondence between ourselves and Metro Container Corporation that we have in our possession are the contract document and shipping paper. We have no other correspondence with any other third party regarding the 230 drums.

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(Red)

6. Amtrak has no knowledge of any other persons who generated, treated, stored, transported, or disposed or who arranged for such handling of substances and/or containers to this site.

7. Amtrak has no real estate interests at this site.

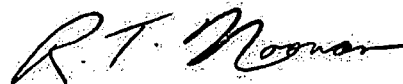
8. The empty crushed drums were sent to this site for disposal.

Enclosed are copies of all documents in Amtrak's possession regarding the disposal of these drums. The efforts taken to identify these documents were done so through knowledge of the responsibilities of our in-house personnel. This included contacting our Purchasing, Material Control, Mechanical, Legal and Environmental Control departments.

Amtrak is self insured for the first \$25 million of liability.

Please contact me if you need additional information. I can be reached in Washington, D.C. at (202) 383-2583.

Very truly yours,



R. T. Noonan  
Sr. Director, Environmental  
Control & Industrial Hygiene

Enclosures:

cc: J.I. Roberts  
B.J. Tripoli  
D.J. Rewkowski

# SHIPPING DOCUMENT

NATIONAL RAILROAD PASSENGER CORP.

ORIGINAL

ORIGINAL  
(Red)

C 24611

ACCTG CODE

ITEM	ICC	SUB	RES/LOC CENTER	FUNCTION	WORK ORDER	ORI DEF
		522	7311	1875		

CARRIER Metro Container (Enterprises)

SHIP TO: Metro Container  
2400 PRICE ST  
TRAINER, PA

SHIPPING DATE	PURCHASE ORDER NO./SUPPL. NO. 482340-8
CONTRACT NO.	AME-APPRO-PROJECT
ACCOUNT NO.	NUMBER & KIND OF PACKAGES
BILL OF LADING NO./PRO. NO.	VALUE OF SHIPMENT N/A
SHIP VIA	PPD. COLL. REJECTION NC
INSPECTION REQUIREMENTS	APPLICABLE CONSIGNEE PURCHASE ORDER NO./DR. NO.

ATTENTION OF:

Shipped From: Amtrak NRPC  
Wilmington Maintenance Facility  
Foot of Cassenger Ave  
Wilmington, DE. 19802

ITEM NO	QUAN. TITY	UNIT	DESCRIPTION INCLUDE, O.E.M. NO., SERIAL NO. (AS APPLICABLE), AMTRAK PART NO.	PACKAGE NUMBER	NET WEIGHT	GROSS WEIGHT
1	230	EA	NON-HAZARDOUS 55 gallon drums (CRUSHED)			230

REASON FOR SHIPMENT

BUYER'S SIGNATURE AND DATE

MISCELLANEOUS SHIPMENTS (NOT AUTHORIZED BY A PURCHASE ORDER/SUPPL.) REQUIRES REASON FOR SHIPMENT AND AUTHORIZED APPROVAL

PACKAGES RECEIVED BY

SHIPPER'S SIGNATURE

ORIGINATOR

DEPT

EXT

APPROVAL

NRPC-696 (4/75)

ORIGINAL  
4/22/88

MR. R. NOONAN:

ORIGINAL  
(Red)

REFERENCE OUR SHIPMENT OF CRUSHED DRUMS THROUGH METRO CONTAINER, PLEASE BE ADVISED TO THE FOLLOWING:

3/17/88 - SPOKE TO MATT HUTCHINSON REGARDING 30 CU. FT. ROLL-OFF

3/21/88 - WAS INFORMED BY MATT HUTCHINSON THAT AL WESTFALL OF METRO CONTAINER WOULD BE CALLING ABOUT COMING IN TO CHECK OUR DRUM SITUATION; TO SEE IF THEY WOULD ACCEPT THEM. LATER THE SAME DAY, I WAS INFORMED BY MICHELLE THAT FRAN. MILLER OF METRO CONTAINER WAS COMING IN.

MET WITH FRAN MILLER AND AL WESTFALL AT 11:35 AM AND WAS INFORMED THEY HAD VISITED THE CRUSHER AREA WITH F. WILLIAMS, AND WOULD CONTACT MATT HUTCHINSON ABOUT TAKING THE DRUMS. AL & FRAN SPECIFIED IN THE FUTURE (IF IF THEY GOT THE CONTRACT) THEY DID NOT WANT THE DRUMS CRUSHED; BUT MERELY DRAINED.

3/22/88 - WAS INFORMED BY MATT HUTCHINSON THAT METRO CONTAINER WOULD GET THE CONTRACT.

3/23/88 - WAS ADVISED BY AL WESTFALL OF METRO CONTAINER THEY WOULD PICK UP THE DRUMS ON 3/24/88  
(P.O. # 482340-8)

2 L  
ORIGINAL  
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(Red)

3/24/88 - LOADED TRUCK FROM "METRO CONTAINER" WITH 230  
DRAINED, CRUSHED NON-PC.B. DRUMS.

DRUMS IN QUESTION WERE EMPTIED INTO LS#2 & LS#10  
HOLDING TANKS ON 3/10/88 & 3/11/88; WITH LS#2 TANK BEING  
FILLED ON 3/10/88 AND LS#10 TANK FILLED ON 3/11/88. AFTER  
DRUMS WERE WERE TURNED UP-SIDE DOWN, AND REMAINED  
IN THIS POSITION UNTIL CRUSHED.

SOME OF THESE DRUMS WERE PARTIALLY FULL, BECAUSE  
PETROCON HAD DRAWN SOME OF THE OILS FROM THE DRUMS  
FOR RECYCLING. TO THE BEST OF MY KNOWLEDGE THESE  
DRUMS CONTAINED NON-HAZARDOUS, NON-PC.B WASTE OIL.

RESPECTFULLY,

*F. J. Clark*

AL WETTABLE



**Metro Container Corp.**  
**Metro-Enterprise Container Corp.**

Second & Price Streets  
Trainer, PA 19013

Francis Miller

(215) 485-6100